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March 27, 2025

Via ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *EscapeX IP, LLC v. Google LLC*, Civil Action No. 1:23-cv-10839
Letter Motion to Seal Google's Response to Letter Motion for Conference**

Your Honor:

Google LLC ("Google") files this motion to seal its response to Plaintiff EscapeX IP, LLC's ("EscapeX") and its counsel's, William P. Ramey III, letter motion "to request a status conference concerning an ongoing breach of N.Y.R. Prof. Conduct 4.2 by opposing counsel," *i.e.*, the undersigned. Doc. 36 at 1 (Google's "Letter Response"). Google's Letter Response discusses the contents of the sealed document filed at Doc. 42; in addition, the Letter Response addresses certain other issues that reflect information that is confidential to Google, are subject to confidentiality obligations owed to another party, or both. Therefore, Google respectfully requests that the Court grant this Motion and maintain Google's Letter Response under seal.

Certificate of Conference

I emailed EscapeX's counsel on March 26, 2025 to confirm my understanding that EscapeX would not oppose Google's request to seal its Letter Response. EscapeX's counsel confirmed that EscapeX does not oppose this motion by email on March 27, 2025.

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 3/31/2025

The motion to seal is GRANTED. The Clerk of Court is directed to maintain the viewing restrictions at ECF No. 56.

The Clerk of Court is respectfully directed to terminate the gavel at ECF No. 55.

Respectfully submitted,

/s/ Jeff Barron

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